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*ADMITTED IN NY & NJ

March 23, 2020

BY ECF

The Honorable Joanna Seybert
United States District Judge
Alfonse D'Amato Courthouse, Room 1034
100 Federal Plaza
Central Islip, 11722-4440

ORDER

Re: United States v. Conde, et al.
19 Cr. 432 (JES)

Dear Judge Seybert:

I represent Benjamin Conde in the above-referenced matter. I write to request that Mr. Conde's bail be modified, with the consent of the government. The basis for this application is as stated below.

At the time of his arrest in September, Mr. Conde was released on a \$250,000 Personal Recognizance Bond signed by his wife and secured by his home in New Jersey. Mr. Conde has been compliant with all conditions of his bail since that time, and has twice traveled back and forth to Florida with the Court's permission and without incident.

Mr. Conde and his wife wish to sell their home in New Jersey, and move into a rental property in an "adult community" near where they live now. The government, by AUSA Erin Argo, has agreed to permit Mr. Conde to sell his home, provided that he posts \$50,000 of cash proceeds from that sale with the Clerk of Court for the Eastern District of New York. That term is agreeable to Mr. Conde.

Therefore, I respectfully request that the Court modify the terms of Mr. Conde's bail to permit him and his wife to sell their home, with the condition that they will deposit \$50,000 of the proceeds of such sale into the registry of the court with the Clerk of the Eastern District. As noted above, the government has no objection to this request.

Respectfully submitted,

Roland G. Riopelle

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Cc: All Counsel (By ECF)
AUSA Erin Argo (By Email)

The Defendant Benjamin Conde having made an application to modify his bail restrictions to permit him to sell his home and deposit \$50,000 from the sale of said home into the registry of the Court, and the government having no objection to said transaction, and good cause appearing to grant the Defendant's application,

IT IS ORDERED, that the Defendant Benjamin Conde is permitted to sell his home, provided that he deposits \$50,000 from the sale of said home in the registry of the Court, to secure his future appearances in this matter.

SO ORDERED:

Dated: March 25, 2020
Central Islip, NY

/s/ JOANNA SEYBERT
HON. JOANNA E. SEYBERT